

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Division)

PWG 17 CV2580

JOHN HOWE  
299 Raleigh Drive, Apt. E2  
Clarksville, TN 37043,

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Plaintiff,

v.

ZENIMAX MEDIA, INC., *et al.*,

Defendants.

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**COMPLAINT ADOPTING EXHIBIT 1 SUBMITTED HEREWITH, BY  
INCORPORATION BY REFERENCE, AND JURY PRAYER**

JOHN HOWE, Plaintiff, *pro se*, hereby adopts by reference the entirety of EXHIBIT 1 submitted herewith, but with the following modifications, by interlineation:

1. Substitute the following for the *ad damnum* clause set forth in the incorporated Exhibit 1:
  - A. Plaintiff John Howe seeks compensatory damages of \$13.5 Million (\$13,500,000) from the Defendants jointly and severally
  - B. Plaintiff John Howe seek exemplary damages that are

commensurate to the harm he suffered as a result of the malicious acts and the financial means and asserts of each Defendant named herein.

C. Plaintiff John Howe seeks an accounting of all profits realized by the corporate Defendants from the video game Elder Scrolls Online and any other video game developed by the corporate Defendants that relies in any significant way on his pre-employment work product.

D. Plaintiff John Howe seeks such other and further relief as may be appropriate and just.

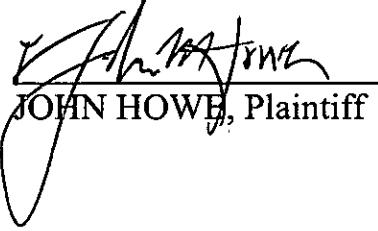
2. Each reference to "Assignor" shall be changed to "Plaintiff John Howe" and each reference to "John Howe" or "Mr. Howe" shall be changed to "Plaintiff John Howe". (Grammatical errors, if any, created by the foregoing changes will be corrected as necessary to clarify the substance of this pleading.)

Date: 8/31/2017.

  
JOHN HOWE, Plaintiff  
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Clarksville, TN 37043,  
v - 206-854-4542; facsimile - 717-230-1938  
johnhowe2@gmail.com

**PRAYER FOR JURY TRIAL**

Plaintiff JOHN HOWE, *pro se*, hereby prays that all claims set forth in this pleading, including the matter incorporated by reference, that are triable by jury be so tried.

  
JOHN HOWE, Plaintiff